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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WASTE ACTION PROJECT,

Plaintiff,

v.

UNITED STATES BAKERY D.B.A.  
FRANZ FAMILY BAKERIES, INC.,

Defendant.

COMPLAINT

**I. INTRODUCTION**

1. This action is a citizen suit brought under Section 505 of the Clean Water Act (“CWA”) as amended, 33 U.S.C. § 1365. Plaintiff, Waste Action Project, seeks a declaratory judgment, injunctive relief, the imposition of civil penalties, and the award of costs, including attorneys’ and expert witnesses’ fees, for Defendant United States Bakery d.b.a. Franz Family Bakeries, Inc.’s (“Franz”) repeated and ongoing violations of effluent standards and limitations under the CWA, as defined at 33 U.S.C. § 1365(f), particularly the terms and conditions of its National Pollutant Discharge Elimination System (“NPDES”) permit authorizing certain

1 stormwater discharges of pollutants from Franz's Seattle, Washington facility to navigable  
2 waters.

## 3 II. JURISDICTION AND VENUE

4 2. The Court has subject matter jurisdiction over Waste Action Project's claims  
5 under Section 505(a) of the CWA, 33 U.S.C. § 1365(a). Franz is in violation of an "effluent  
6 standard or limitation" as defined by Section 505(f) of the CWA, 33 U.S.C. § 1365(f). Sections  
7 309(d) and 505(a) and (d) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a) and (d), authorize the  
8 relief Waste Action Project requests.

9 3. Under Section 505(b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A), Waste  
10 Action Project notified Franz of its violations of the CWA and of Waste Action Project's intent  
11 to sue under the CWA by letter dated and postmarked September 20, 2021 and delivered to  
12 Franz on September 22, 2021 ("Notice Letter"). A copy of the Notice Letter is attached to this  
13 complaint as Exhibit 1. The allegations in the Notice Letter are incorporated herein by this  
14 reference. In accordance with Section 505(b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A) and  
15 40 C.F.R. § 135.2(a)(1), Waste Action Project notified the Administrator of the United States  
16 Environmental Protection Agency ("EPA"), the Administrator of EPA Region 10, and the  
17 Director of the Washington Department of Ecology ("Ecology") of its intent to sue Franz by  
18 mailing copies of the Notice Letter to these individuals on September 20, 2021.

19 4. At the time of the filing of this Complaint, more than sixty days have passed since  
20 the Notice Letter and copies thereof were issued in the manner described in the preceding  
21 paragraph.

22 5. The violations complained of in the Notice Letter are continuing and/or are  
23 reasonably likely to re-occur.



1 aesthetic, and/or health interest of Waste Action Project and its members have been, are being,  
2 and will be adversely affected by Franz's violations of the CWA. The relief sought in this  
3 lawsuit can redress the injuries to these interests.

4       11. Waste Action Project has organizational standing to bring this action. Waste  
5 Action Project has been actively engaged in a variety of educational and advocacy efforts to  
6 improve water quality and to address sources of water quality degradation in the waters of  
7 Western Washington, including the Duwamish East Waterway and Puget Sound. As detailed  
8 herein and in the Notice Letter, Franz has failed to comply with numerous requirements of its  
9 NPDES permit including compliance with water quality standards, effluent limitations,  
10 Stormwater Pollution Prevention Plan ("SWPPP") requirements, monitoring and reporting  
11 requirements, Corrective Action requirements, recordkeeping requirements, and requirements to  
12 report permit violations. As a result, Waste Action Project is deprived of information necessary  
13 to properly serve its members by providing information and taking appropriate action to advance  
14 its mission. Waste Action Project's efforts to educate and advocate for greater environmental  
15 protection, and to ensure the success of environmental restoration projects implemented for the  
16 benefit of its members are also obstructed. Finally, Waste Action Project and the public are  
17 deprived of information that influences members of the public to become members of Waste  
18 Action Project, thereby reducing Waste Action Project's membership numbers. Thus, Waste  
19 Action Project's organizational interests have been adversely affected by Franz's violations.  
20 These injuries are fairly traceable to Franz's violations and are redressable by the Court.

21       12. Franz is a corporation authorized to conduct business under the laws of the State  
22 of Washington.

23       13. Franz owns and operates a commercial bakery located at or about 2901 6<sup>th</sup> Ave S,  
24 Seattle, WA 98134-2103 (referred to herein as the "facility").

#### IV. LEGAL BACKGROUND

14. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person, unless in compliance with the provisions of the CWA. A discharge of a pollutant from a point source to waters of the United States without authorization by a NPDES permit, issued under Section 402 of the CWA, 33 U.S.C. § 1342, constitutes a violation of Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and an “effluent standard or limitation” under Section 505(a)(1) and (f) of the CWA, 33 U.S.C. § 1365(a)(1) and (f). Conditions of NPDES permits are “effluent standards or limitations” under Section 505(a)(1) and (f) of the CWA, 33 U.S.C. § 1365(a)(1) and (f). Section 505(a)(1) of the CWA, 33 U.S.C. § 1365(a)(1), authorizes citizen suits against violators of “effluent standards or limitations.”

15. The State of Washington has established a federally approved state NPDES program administered by Ecology. Wash. Rev. Code § 90.48.260; Wash. Admin. Code ch. 173-220. This program was approved by the Administrator of the EPA pursuant to Section 402(b) of the CWA, 33 U.S.C. § 1342(b).

16. Under Section 402 of the CWA, 33 U.S.C. § 1342, Ecology has repeatedly issued Industrial Stormwater General Permits, most recently on November 20, 2019, effective January 1, 2020, and set to expire December 31, 2024 (the “2020 Permit”). The previous permit was issued December 3, 2014, became effective January 2, 2015, and expired December 31, 2019 (the “2015 Permit”). The 2015 Permit and 2020 Permit (collectively, “the Permits”), contain substantially similar requirements and authorize those that obtain coverage thereunder to discharge stormwater associated with industrial activity, a pollutant under the CWA, and other pollutants contained in the stormwater to waters of the United States subject to certain terms and conditions.



requirement, failing to establishing an adequate stormwater pollution prevention plan, failing to collect quarterly samples or analyzing quarterly samples once collected, failing to correctly and timely submit accurate and complete annual reports and discharge monitoring reports (“DMRs”), failing comply with visual monitoring requirements, failing to record information, failing to retain records, and failing to report permit violations.

22. Franz discharges stormwater from the facility containing levels of pollutants that exceed the benchmark values established by the Permits, including the days on which Franz collected samples with the results identified in Table 1, and is likely to continue discharging comparably unacceptable levels of pollutants in its stormwater:

**Table 1: Monitoring Point 001 Benchmark Exceedances**

Quarter in which sample was collected	Turbidity (Benchmark: 25 NTU)	Oil Sheen (Yes/No)	Copper (Benchmark: 14 µg/L)	Zinc (Benchmark: 117 µg/L)	BOD <sub>5</sub> (Benchmark: 30 mg/L)
3 <sup>rd</sup> Quarter 2016		Yes			
1 <sup>st</sup> Quarter 2020			21.5	139	
2 <sup>nd</sup> Quarter 2020			23.7		61.7
3 <sup>rd</sup> Quarter 2020	110		44.5	358	
4 <sup>th</sup> Quarter 2020	34.6		27.35	166.35	
1 <sup>st</sup> Quarter 2021	47	Yes	17		
3 <sup>rd</sup> Quarter 2021		Yes	15		37.75

23. Franz discharges stormwater from the facility containing levels of pollutants that exceed the effluent limitations established by the Permits, including the days on which Franz collected samples with the results identified in Table 2, and is likely to continue discharging comparably unacceptable levels of pollutants in its stormwater:

**Table 2: Monitoring Point 001 Effluent Limitation Violations**

Date on which sample was collected	TSS (Effluent Limitation: 30 mg/L)
December 21, 2021	101.4
March 18, 2021	60
September 27, 2021	75

24. The stormwater monitoring data provided in Table 1 and 2 shows benchmark exceedances and effluent limitations included in the stormwater monitoring results that Franz submitted to Ecology.

25. The Permits require Franz's monitoring to be representative of discharges from the facility. The stormwater monitoring results that Franz routinely submits to Ecology are not representative of the facility's stormwater discharges.

26. Franz's stormwater discharges are causing or contributing to violations of water quality standards and therefore violate the Permits. Discharges from Franz's facility contribute to the polluted conditions of the waters of the State, including the water quality standards of the Duwamish East Waterway and Puget Sound. Discharges from Franz's facility contribute to the ecological impacts that result from the pollution of these waters and to Waste Action Project and its members' injuries resulting therefrom. These requirements and Franz's violations thereof are described in detail in section I.A and II of the Notice Letter, attached hereto as Exhibit 1, and incorporated herein by this reference.

27. Franz's exceedances of the benchmark values indicate that Franz is failing to apply AKART to its discharges and/or is failing to implement an adequate SWPPP and BMPs. Franz violated and continues to violate the Permits by not developing, modifying, and/or implementing BMPs in accordance with the requirements of the Permits, and/or by not applying



1 AKART to discharges from the facility. These requirements and Franz's violations thereof are  
2 described in detail in section I.B and section III of the Notice Letter, attached as Exhibit 1, and  
3 incorporated herein by this reference.

4 28. Franz has violated and continues to violate the monitoring requirements of the  
5 Permits. For example, the Permits require Franz to sample its stormwater discharges once during  
6 every calendar quarter at each distinct point of discharge offsite except for substantially identical  
7 outfalls. However, Franz has failed and is failing to monitor discharges from the multiple  
8 additional places where discharge is leaving the facility. Franz failed to collect stormwater  
9 samples for all parameters at Monitoring Point 001 during the third quarter 2016, fourth quarter  
10 2016, second quarter 2017, third quarter 2017, fourth quarter 2017, first quarter 2018, second  
11 quarter 2018, third quarter 2018, fourth quarter 2018, first quarter 2019, second quarter 2019,  
12 third quarter 2019, fourth quarter 2019, and second quarter 2021.

13 29. Franz failed to analyze quarterly samples at Monitoring Point 001 including those  
14 identified above in paragraph 28, and for total suspended solids ("TSS") in the first quarter 2017,  
15 first quarter 2020, second quarter 2020, and third quarter 2020.

16 30. Franz failed to submit timely DMRs for fourth quarter 2016, fourth quarter 2017,  
17 first quarter 2018, third quarter 2018, fourth quarter 2018, second quarter 2019, first quarter  
18 2020, second quarter 2020. Additionally, the Water Quality Program Corrections Required  
19 document signed by Ecology on July 3, 2018 required that Franz submit their fourth Quarter  
20 2017 DMR by July 22, 2018. Franz failed to meet that deadline and submitted their fourth  
21 Quarter 2017 DMR on August 8, 2018.

22 31. Franz failed to timely submit Annual Reports for 2017, 2018, and 2019. Franz has  
23 failed and continues to fail to submit an Annual Report for 2017 and 2018.

1           32. Franz has failed to conduct Industrial Stormwater Monthly Inspection Reports, by  
2 qualified personnel, each and every month for the last five years. Additionally, Franz has failed  
3 to prepare and maintain the requisite inspection reports or checklists and failed to make the  
4 requisite certifications and summaries. These monitoring and inspection requirements and  
5 Franz's violations thereof are described in section IV.E of the Notice Letter, attached hereto as  
6 Exhibit 1, and incorporated herein by this reference.

7           33. Franz has not conducted and/or completed the Level One Corrective Action  
8 responses as required by the Permits. These requirements of the Permits and Franz's violations  
9 thereof are described in section V.A of the Notice Letter, attached hereto as Exhibit 1, and  
10 incorporated herein by this reference.

11           34. Condition S8.B of the Permits require a permittee to undertake a Level One  
12 Corrective Action whenever it exceeds a benchmark value identified in Condition S5.A, Table 2  
13 of the Permits, as well as Condition S5.B and Table 3 of the Permits. A Level One Corrective  
14 Action comprises of conducting an inspection to investigate the cause, review of the SWPPP to  
15 ensure permit compliance, revisions to the SWPPP to include additional operational source  
16 control BMPs with the goal of achieving the applicable benchmark values in future discharges,  
17 signature and certification of the revised SWPPP, summary of the Level One Corrective Action  
18 in the Annual Report, and full implementation of the revised SWPPP as soon as possible, but no  
19 later than the DMR due date for the quarter the benchmark was exceeded. Condition S8.A of the  
20 2020 Permit requires that the permittee implement any Level One Corrective Action required by  
21 the 2015 Permit.

22           35. Franz triggered Level One Corrective Action requirements for each benchmark  
23 exceedance identified in Table 1 above. Franz's failures to comply with the Level One  
24 Corrective Action requirements include the failure to perform the required review, revision, and

1 certification of the SWPPP; perform required implementation of additional BMPs; and complete  
2 the required summarization in the Annual Report each and every time for the last five years, its  
3 quarterly stormwater sampling results were greater than a benchmark or outside the benchmark  
4 range, including the benchmark exceedances listed in Table 1 above. These corrective action  
5 requirements and Franz's violations thereof are described in section V.A of the Notice Letter,  
6 attached hereto as Exhibit 1, and are incorporated herein by this reference.

7 36. Franz has not conducted and/or completed the Level Two Corrective Action  
8 responses as required by the Permits. These requirements of the Permits and Franz's violations  
9 thereof are described in section V.B of the Notice Letter, attached hereto as Exhibit 1, and  
10 incorporated herein by this reference.

11 37. Condition S8.C of the Permits require a permittee to undertake a Level Two  
12 Corrective Action whenever it exceeds a benchmark value identified in Condition S5 during any  
13 two quarters during a calendar year. A Level Two Corrective Action comprises review of the  
14 SWPPP to ensure permit compliance, revisions to the SWPPP to include additional structural  
15 source control BMPs with the goal of achieving the applicable benchmark values in future  
16 discharges, signature and certification of the revised SWPPP, summary of the Level Two  
17 Corrective Action in the Annual Report, and full implementation of the revised SWPPP as soon  
18 as possible, but no later than August 31st of the year following the triggering of the Level Two  
19 Corrective Action. Condition S8.A of the 2020 Permit requires that the permittee implement any  
20 Level Two Corrective Action required by the 2015 Permit.

21 38. Franz triggered Level Two Corrective Action requirements for each benchmark  
22 exceedance identified in Table 1 above that occurred in any two quarters of a calendar year.  
23 Franz has violated the requirements of the Permits described above by failing to conduct a Level  
24

1 Two Corrective Action for discharge from its facility in accordance with Permits' conditions,  
2 including the required review, revision and certification of the SWPPP; the required  
3 implementation of additional BMPs, including additional structural source control BMPs; and  
4 the required summarization in the Annual Report each time since January 1, 2015, quarterly  
5 stormwater sampling results from the facility were greater than a benchmark or outside the  
6 benchmark range for any two quarters during a calendar year, including the benchmark  
7 exceedances listed in Table 1 above. These violations include Franz's to perform a Level Two  
8 Corrective Action for copper benchmark exceedances triggered in the second quarter of 2020;  
9 zinc benchmark exceedances triggered in the third quarter of 2020; turbidity benchmark  
10 exceedances triggered in the fourth quarter of 2020; and copper benchmark exceedances  
11 triggered in the third quarter of 2021, as identified in Table 1. These corrective action  
12 requirements and Franz's violations thereof are described in section V.B of the Notice Letter,  
13 attached hereto as Exhibit 1, and are incorporated herein by this reference.

14 39. Condition S8.D of the Permits require a permittee to undertake a Level Three  
15 Corrective Action whenever it exceeds a benchmark value identified in Condition S5 during any  
16 three quarters during a calendar year. A Level Three Corrective Action comprises review of the  
17 SWPPP to ensure permit compliance, revisions to the SWPPP to include additional treatment  
18 BMPs and operational and/or structural source control BMPs if necessary, with the goal of  
19 achieving the applicable benchmark values in future discharges, signature and certification of the  
20 revised SWPPP, summary of the Level Three Corrective Action in the Annual Report, and full  
21 implementation of the revised SWPPP as soon as possible, but no later than September 30th of  
22 the year following the triggering of the Level Three Corrective Action. Condition S8.D also  
23 requires that before implementation of any BMPs that require site-specific design or sizing of  
24

1 structures, equipment, or processes, that the permittee submit an engineering report, plans, and  
2 specifications, and an Operation and Maintenance Manual to Ecology for review, which must be  
3 submitted no later than May 15th prior to the Level Three Corrective Action deadline. Condition  
4 S8.A of the 2020 Permit requires that the permittee implement any Level 3 corrective action  
5 required by the 2015 Permit.

6 40. Franz triggered Level 3 corrective action requirements for each benchmark  
7 exceedance identified in Table 1 above that occurred in any three quarters of a calendar year.  
8 Franz has violated the requirements of the Permits described above by failing to conduct a Level  
9 Three Corrective Action in accordance with Permit conditions, including the required review,  
10 revision, and certification of the SWPPP, the required implementation of additional BMPs, the  
11 required submission of an engineering report and Operation and Maintenance Manual, and the  
12 required summarization in the Annual Report, each time that its quarterly stormwater sampling  
13 results were greater than a benchmark for any three quarters during a calendar year, including the  
14 benchmark excursions listed in Table 1 above. These violations include Franz's its failure to  
15 submit to Ecology an Engineering Report, plans and specifications, and the Operation and  
16 Maintenance Manual for the Level Three Corrective Actions for copper benchmark exceedances  
17 triggered in third quarter of 2020 and zinc benchmark exceedances triggered in the fourth quarter  
18 of 2020, as indicated by Table 1. These corrective action requirements and Franz's violations  
19 thereof are described in section V.C of the Notice Letter, attached hereto as Exhibit 1, and are  
20 incorporated herein by this reference.

21 41. Franz has failed and continues to fail to comply with recording and record  
22 keeping requirements of the Permits. These requirements and Franz's violations thereof are  
23  
24

1 described in section VI of the Notice Letter, attached hereto as Exhibit 1, and are incorporated  
2 herein by this reference.

3 42. Condition S9.E of the Permits requires Franz to take certain actions, including  
4 reporting to Ecology, in the event Franz is unable to comply with any terms and conditions of the  
5 Permits which may endanger human health or the environment. Franz has failed to comply with  
6 these requirements of the Permits by failing to report and subsequently correct permit violations,  
7 including each and every time Franz failed to comply with corrective action requirements as  
8 described above in paragraphs 33-40, each and every time Franz failed to sample a stormwater  
9 discharge as described above in paragraph 28, and each and every time Franz discharged  
10 stormwater with amounts of pollutants in excess of the Permit benchmarks or effluent limits as  
11 described in paragraphs 22-24 above. These requirements and Franz's violations thereof are  
12 described in section VII of the Notice Letter, attached hereto as Exhibit 1, and incorporated  
13 herein by this reference.

14 43. Each of Franz's violations of the Permits and the CWA are ongoing in that they  
15 are currently occurring or are likely to re-occur at least intermittently in the future. Waste Action  
16 Project has observed conditions at the site that indicate violations are ongoing, including an oil  
17 sheen in puddles onsite, old and incorrectly used catch basin filter socks, an insufficient berm  
18 separating the gravel and paved portions of the facility, and trash and debris on the ground.

19 44. A significant penalty should be imposed against Franz pursuant to the penalty  
20 factors set forth in 33 U.S.C. § 1319(d).

21 45. Franz's violations were avoidable had Franz been diligent in overseeing facility  
22 operations and maintenance.

23 46. Franz has benefited economically as a consequence of its violations and its  
24

1 failure to implement stormwater management improvements at the facility.

2 47. In accordance with Section 505(c)(3) of the CWA, 33 U.S.C. § 1365(c)(3), and 40  
3 C.F.R. § 135.4, Waste Action Project is mailing a copy of this Complaint to the Administrator of  
4 the EPA, the Regional Administrator for Region 10 of the EPA, and the Attorney General of the  
5 United States.

6 **VI. CAUSE OF ACTION**

7 48. The preceding paragraphs and the allegations in the Notice Letter attached hereto  
8 as Exhibit 1 are incorporated herein.

9 49. Franz's violations of the Permits described herein and in the Notice Letter  
10 constitute violations of "effluent standards or limitations" as defined by Section 505 of the  
11 CWA, 33 U.S.C. § 1365(f).

12 50. No agency has taken an enforcement action constituting diligent prosecution or  
13 otherwise precluding claims under 33 USC 1365(a).

14 51. Prior notice of violations and claims was provided to Defendant and others as  
15 required.

16 52. These violations committed by Franz are ongoing or are reasonably likely to  
17 continue to occur. Any and all additional violations of the Permits and the CWA which occur  
18 after those described in Waste Action Project's Notice Letter, but before a final decision in this  
19 action, should be considered ongoing violations subject to this Complaint.

20 53. Without the imposition of appropriate civil penalties and the issuance of an  
21 injunction, Franz is likely to continue to violate the Permits and the CWA to the further injury of  
22 Waste Action Project, its members, and others.

**VII. RELIEF REQUESTED**

Wherefore, Waste Action Project respectfully requests that this Court grant the following relief:

A. Issue a declaratory judgment that Franz has violated and continues to be in violation of the Permits and Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342;

B. Enjoin Franz from operating the facility in a manner that results in further violations of the Permits and the CWA;

C. Order Franz to immediately implement a SWPPP that complies with the 2020 Permit;

D. Order Franz to allow Waste Action Project to participate in the development and implementation of Franz's SWPPP;

E. Order Franz to provide Waste Action Project, for a period beginning on the date of the Court's Order and running for three years after Franz achieves compliance with all of the conditions of the Permits, with copies of all reports and other documents which Franz submits to Ecology regarding Franz's coverage under the Permits at the facility at the time these documents are submitted to Ecology;

F. Order Franz to take specific actions to remediate the environmental harm caused by its violations;

G. Order Franz to pay civil penalties of \$56,461 per day of violation for each violation committed by Franz, pursuant to Sections 309(d) and 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19 and 19.4;



1 H. Award Waste Action Project its litigation expenses, including reasonable  
2 attorneys' and expert witness fees, as authorized by Section 505(d) of the CWA, 33 U.S.C. §  
3 1365(d), and any other applicable authorization; and

4 I. Award such other relief as this Court deems appropriate.

5  
6 RESPECTFULLY SUBMITTED this 7th day of December, 2021

7  
8 By: Smith & Lowney, PLLC  
s/Richard A. Smith  
Richard A. Smith, WSBA #21788  
9 By: s/Savannah Rose  
Savannah Rose, WSBA #57062  
10 Attorneys for Plaintiff  
2317 E. John St.,  
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13 savannah@smithandlowney.com

# Exhibit 1

**SMITH & LOWNEY, PLLC**

2317 EAST JOHN STREET  
SEATTLE, WASHINGTON 98112  
(206) 860-2883, FAX (206) 860-4187

September 20, 2021

**Via Certified Mail - Return Receipt Requested**

Managing Agent  
United States Bakery d.b.a. Franz Family Bakeries, Inc.  
2901 6th Ave S  
Seattle, WA 98134

Managing Agent  
United States Bakery d.b.a. Franz Family Bakeries, Inc.  
PO Box 24327  
Seattle, WA 98124-0327

**Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND  
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION  
PLAN**

Dear Managing Agent:

We represent Waste Action Project, P.O. Box 9281, Covington, WA 98042, (206) 849-5927. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days' notice of Waste Action Project's intent to file a citizen suit against United States Bakery d.b.a. Franz Family Bakeries, Inc. ("Franz"), under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Franz's National Pollution Discharge Elimination System ("NPDES") permit.

Franz was granted coverage under the Industrial Stormwater General Permit ("ISGP") issued by the Washington Department of Ecology ("Ecology") effective January 2, 2015 and expired on December 31, 2019, under NPDES No. WAR002292 (the "2015 Permit"). Ecology granted Franz coverage under the current iteration of the ISGP effective January 1, 2020, set to expire on December 31, 2024 (the "2020 Permit"), which maintains the same permit number: WAR002292.

Franz has violated and continues to violate effluent standards and limitations under the CWA (see 33 U.S.C. § 1365(f)) including the terms and conditions of the 2015 Permit and the 2020 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from its facility located at or about 2901 6th Ave S, Seattle, WA 98134 as described herein, to the Duwamish East Waterway via storm drain and then to the

Puget Sound. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Franz.

## **I. COMPLIANCE WITH APPLICABLE STANDARDS**

### **A. Compliance with Water Quality Standards**

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of the Permits require that Franz's discharges not cause or contribute to an excursion of Washington State water quality standards.

Franz discharges to the Duwamish East Waterway via storm drain and then to the Puget Sound, which does not meet water quality standards for sediment quality and is included on the state's "303(d) list" of impaired water bodies. Franz discharges stormwater that contains elevated levels of turbidity, oil sheen, copper, zinc, five-day biochemical oxygen demand ("BOD<sub>5</sub>"), and total suspended solids ("TSS") as indicated in Tables 1 and 2. Moreover, the discharges Franz has sampled and reported underrepresent the polluted condition of its facility discharges, as explained below. These discharges cause and/or contribute to violations of water quality standards, in the Duwamish East Waterway and the Puget Sound, and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. *See* WAC 173-201A-260 (including toxics and aesthetics criteria); WAC 173-201A-240 (toxic substances); WAC 173-201A-610 (use designations for marine waters); WAC 173-201-612 (use designations for marine water including Puget Sound); WAC 173-201A-210 (including criteria for turbidity), WAC 173-201A-240 (including criteria for copper, zinc, dissolved oxygen), WAC 173-201A-602 (use designations for fresh waters by water resource inventory area, including the Duwamish). Precipitation data from that time period is appended to this Notice of Intent to Sue and identifies these days.

**Table 1: Monitoring Point 001 Benchmark Exceedances**

Quarter in which sample was collected	Turbidity (Benchmark: 25 NTU)	Oil Sheen (Yes/No)	Copper (Benchmark: 14 µg/L)	Zinc (Benchmark: 117 µg/L)	BOD <sub>5</sub> (Benchmark: 30 mg/L)
3 <sup>rd</sup> Quarter 2016		Yes*			
1 <sup>st</sup> Quarter 2020			21.5	139	
2 <sup>nd</sup> Quarter 2020			23.7		61.7
3 <sup>rd</sup> Quarter 2020	110		44.5	358	
4 <sup>th</sup> Quarter 2020	34.6		27.35	166.35	
1 <sup>st</sup> Quarter 2021	47	Yes	17		

\* Data from 2016 Annual Report

Condition S5.F of the Permits require Franz to manage stormwater to prevent the discharge of synthetic, natural or processed oil or oil-containing products as identified by an oil sheen and trash and floating debris. Franz is in violation of this condition because both oil sheen and “foamy floatables” were identified at the discharge point, as documented by the 2016 Annual Report.

## **B. Compliance with AKART Standards**

Condition S10.C of the Permits requires Franz to apply all known and reasonable methods of prevention, control, and treatment (“AKART”) to all discharges, including preparation and implementation of an adequate SWPPP and best management practices (“BMPs”). Franz has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in Table 1 and as described below in this Notice of Intent to Sue.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the Permits. Franz has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

## **II. EFFLUENT LIMITATION VIOLATIONS.**

Condition S6.C.1 of the Permits requires permittees discharging to a “303(d)-listed” waterbody (Water Quality Category 5), either directly or indirectly through a stormwater drainage system must comply with the applicable sampling requirements and numeric effluent limits in Table 6 of the Permits. The “applicable sampling requirements and numeric effluent limits” means the sampling and effluent limits in Table 6 that correspond to the specific parameter(s) the receiving water is 303(d)-listed for at the time of permit coverage, or TSS if the waterbody is 303(d)-listed for sediment quality at the time of permit coverage.

Franz discharges via a storm drain lateral under the parking lot at the facility leading to a storm drain main line along 6<sup>th</sup> Ave. S, which then discharges to the Duwamish East Waterway, which is 303(d)-listed for sediment quality and a Puget Sound Sediment Cleanup

Site. Franz's discharges are subject to a maximum daily effluent limitation of 30 mg/L for TSS. Franz discharges stormwater that contains elevated levels of TSS in excess of the corresponding numeric effluent limitation, as indicated in Table 2 below. Each and every one of these discharges is a separate violation of the Permits.

<b>Table 2: Monitoring Point 001 Effluent Limitation Violations</b>	
Date on which sample collected	TSS (Effluent Limitation: 30 mg/L)
December 21, 2021	101.4
March 18, 2021	60

### III. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS

Franz is in violation of the Permits' SWPPP provisions as follows:

1. Condition S3.A of the Permits requires Franz to develop and implement a SWPPP that contains specified components. Condition S3.A.2 of the 2015 Permit and Condition S3.A.1 of the 2020 Permit require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. Franz has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

2. Condition S3.A of the Permits requires Franz to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. Franz has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented, and has not been updated as necessary.

3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. *See Stormwater Management Manual for Western Washington*, July 2019, <https://fortress.wa.gov/ecy/ezshare/wq/Permits/Flare/2019SWMMWW/Content/Resources/DocsForDownload/2019SWMMWW.pdf>. Franz's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

4. Franz's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an

adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours, and seasonal variations in business hours or in industrial activities as required.

5. Franz's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

6. Franz's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

7. Franz's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

8. Franz's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance, and modification.

9. Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement mandatory BMPs. Franz is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.



10. Franz's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs. Franz fails to include operation source control BMPs in the following categories: good housekeeping (including the definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Franz will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit). Some of the BMPs that Franz is failing to implement as evidenced by Annual Reports, Farallon Consulting Technical Memorandums, and Environmental Report Tracking System (ERTS) Reports include:

- Failure to employ methods to eliminate or minimize oil and grease contamination, documented by the 2016 Annual Report and evidenced by photographs from the June 29, 2018 Ecology inspection;
- Failure to prevent floating debris from accumulating at the discharge point, documented by the 2016 Annual Report;
- Failure to sweep paved surfaces, documented by the January 15, 2021; April 2, 2021; and May 6, 2021 Technical Memorandums;
- Failure to seal cracks in pavement, documented by the 2020 Annual Report and April 2, 2021 Technical Memorandum.
- Failure to control on-site sources of dust, sediment accumulation, and track out from the gravel parking lot, documented by the January 15, 2021; April 2, 2021; and May 6, 2021 Technical Memorandums and the ERTS #705759;
- Failure to remove solids and sediment buildup from stormwater collection and conveyance system components, documented by the January 15, 2021; April 2, 2021; and May 6, 2021 Technical Memorandums;
- Failure to maintain catch basins and catch basin filter inserts, documented by the January 15, 2021; April 2, 2021; and May 6, 2021 Technical Memorandums; and
- Failure to use grading, berming, or curbing to prevent runoff of contaminated flows, documented by the April 2, 2021 and May 6, 2021 Technical Memorandums.

11. Franz's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to



stormwater sewers or surface waters and ground waters of the state, including failing to prevent solids from entering the stormwater and discharging off-site.

12. Franz's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff.

13. Franz's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

14. Franz's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

15. Franz's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that: identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations; documents why each discharge point is not sampled; identifies each sampling point by its unique identifying number; identifies staff responsible for conducting stormwater sampling; specifies procedures for sampling collection and handling; specifies procedures for sending samples to the a laboratory; identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods; and specifies the procedure for submitting the results to Ecology.

#### **IV. MONITORING AND REPORTING VIOLATIONS**

##### **A. Failure to Collect Quarterly Samples**

Condition S4.B of the Permits requires Franz to collect a sample of its stormwater discharge once during every calendar quarter. Franz violated this requirement by failing to collect stormwater samples for Monitoring Point 001 during the third quarter 2016, fourth quarter 2016, second quarter 2017, third quarter 2017, fourth quarter 2017, first quarter 2018, second quarter 2018, third quarter 2018, fourth quarter 2018, first quarter 2019, second quarter 2019, third quarter 2019, fourth quarter 2019, and second quarter 2021.

Condition S4.B.2.c of the 2015 Permit and S4.B.3.a of the 2020 Permit require Franz to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria but require the collection of a sample even if the criteria cannot be met. Franz has collected stormwater discharge samples from only one point of discharge, designated as Outfall 1. There are other points of discharge of stormwater from the facility and Franz is in violation of these conditions of the Permit by failing to collect and analyze stormwater samples from them during every quarter for the past five years. These violations will continue until Franz commences monitoring all distinct points of discharge.

**B. Failure to Analyze Quarterly Samples**

Condition S5.A.1 of the Permits and Table 3 of the Permits requires Franz to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, oil sheen, BOD<sub>5</sub>, total nitrate + nitrite, total phosphorus, and TSS.

Franz violated these conditions by failing to analyze stormwater samples at Monitoring Point 001 during each quarter in which it failed to sample, including those identified above in section IV.A, and for TSS in the first quarter 2017, first quarter 2020, second quarter 2020, and third quarter 2020.

**C. Failure to Correctly and Timely Submit Discharge Monitoring Reports**

Condition S9.A of the 2015 Permit and Condition S9.B of the 2020 Permit require Franz to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Franz has violated these conditions by failing to submit a DMR within the time prescribed for Monitoring Point 001 for fourth quarter 2016, fourth quarter 2017, first quarter 2018, third quarter 2018, fourth quarter 2018, second quarter 2019, first quarter 2020, second quarter 2020. Additionally, the Water Quality Program Corrections Required document signed by Ecology on July 3, 2018 required that Franz submit their fourth Quarter 2017 DMR by July 22, 2018. Franz submitted their fourth Quarter 2017 DMR on August 8, 2018.

**D. Failure to Correctly and Timely Submit Annual Reports**

Condition S9.B of the 2015 Permit and Condition S9.C of the 2020 Permit require Franz to submit a complete and accurate Annual Report to Ecology no later than May 15th of each year. The Annual Report must include corrective action documentation as required in Condition S8.B–D of the Permits. If a corrective action is not yet completed at the time of submission of the Annual Report, Franz must describe the status of any outstanding corrective action. Specific information to be included in the Annual Report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level One, Two, or Three Corrective Actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 Corrective Actions triggered during the previous calendar year, including identification of the date Franz expects to complete corrective actions.

Franz violated these conditions by failing to submit an Annual Report within the prescribed time for 2017, 2018, and 2019. Franz continues to violate these conditions by failing to submit an Annual Report for 2017 and 2018.

### **E. Failure to Comply with Visual Monitoring Requirements**

Condition S7.A of the Permits requires that a monthly visual inspection be conducted at the facility by qualified personnel. Condition S7.B of the Permits requires each inspection to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged; observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges; observations for the presence of illicit discharges; a verification that the descriptions of potential pollutant sources required by the permit are accurate; a verification that the site map in the SWPPP reflects current conditions; and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed). Franz has violated and continues to violate these requirements because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections each and every month.

Condition S7.C of the Permits requires that Franz record the results of each inspection in an inspection report or checklist that is maintained on-site and documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection; the locations inspected; a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits; a summary report and schedule of implementation of the remedial actions Franz plans to take if the site inspection indicates that the facility is out of compliance; the name, title, signature and certification of the person conducting the facility inspection; and a certification and signature of the responsible corporate officer or a duly authorized representative. Franz is in violation of these requirements because, during the last five years, it failed to prepare and maintain the requisite inspection reports or checklists and failed to make the requisite certifications and summaries.

## **V. CORRECTIVE ACTION VIOLATIONS**

### **A. Violations of the Level One Requirements**

Condition S8.B of the Permits requires Franz take specified actions, called a “Level One Corrective Action,” each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range. Condition S5.A, Condition S6.C.2.a, Table 2, and Table 7 of the Permits, as well as Condition S5.B and Table 3 of the Permits establishes the following benchmarks: turbidity 25 NTU; pH 5–9 SU; total copper 14 µg/L; total zinc 117 µg/L; no visible oil sheen; TSS 30 mg/L; BOD<sub>5</sub> 30 mg/L; total nitrate + nitrite 0.68 mg/L; and total phosphorus 2 mg/L.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires that within 14 days of receipt of sampling results that indicate a benchmark exceedance during a given quarter; or, for parameters other than pH or visible oils sheen, the end of the quarter, whichever is later, Franz shall: (1) conduct an inspection to investigate the cause; (2) review the SWPPP for the facility and ensure that it fully complies with Condition

S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (3) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges; (4) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits; and (5) sign, certify, and fully implement the revised SWPPP in accordance with Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Franz is in violation of the Level One Corrective Action requirements in the Permits. It failed to implement Level One Corrective Action within 14 days of receipt or the end of the quarter for each and every benchmark exceedance, including the exceedances in the first quarter 2020 for copper and zinc; second quarter of 2020 for copper and BOD<sub>5</sub>; third quarter 2020 turbidity, copper, and zinc; fourth quarter 2020 for turbidity, copper, and zinc; and first quarter 2021 for turbidity and copper, as identified in Table 1. Franz's failures to comply with the Level One Corrective Action requirements include the failure to conduct an inspection to investigate the cause; perform the required review; revision and certification of the SWPPP; perform required implementation of additional BMPs; complete the required summarization in the Annual Report; and sign, certify, and fully implement the revised SWPPP in accordance with Condition S3 of the Permit each and every time for the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range.

#### **B. Violations of the Level Two Requirements.**

Condition S8.C of the Permits requires Franz take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range in any two quarters during a calendar year. The Permits establish the benchmarks applicable to Franz, which are described in section V.A of this Notice of Intent to Sue.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires Franz: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges; (3) summarize the Level Two Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the Permits; and (4) sign, certify, and implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than August 31 of the following year.

Franz is in violation of the Level Two Corrective Action requirements of the Permits. Franz's continuing violations of these requirements include, but are not limited to, its failure to perform a Level Two Corrective Action for copper when it was triggered in the second quarter of 2020; failure to perform a Level Two Corrective Action for zinc when it was triggered in the third quarter of 2020; failure to perform a Level Two Corrective Action for

turbidity when it was triggered in the fourth quarter of 2020, as identified in Table 1. Franz is in violation of the Permits for each instance when quarterly stormwater sampling results from the facility were greater than a benchmark or outside the benchmark range for any two quarters during a calendar year and Franz failed to conduct and complete a Level Two Corrective Action for discharges from its facility in accordance with Permits' conditions by, inter alia, completing the required review, revision and certification of the SWPPP; performing required implementation of additional BMPs, including additional structural source control BMPs; and completing required summarization in the Annual Report.

### **C. Violations of the Level Three Requirements**

Condition S8.D of the Permits requires Franz take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for any three quarters during a calendar year. The Permits establish the benchmarks applicable to Franz, which are described in section V.A of this Notice of Intent to Sue.

As described by Condition S8.D of the Permits, when Franz triggers a Level Three Corrective Action, it is required to: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Three Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the Permits, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced or if new/additional treatment BMPs will be installed. Condition S8.D.2.b of the Permits require that a licensed professional engineer, geologist, hydrogeologist, or certified stormwater quality professional must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the Permits requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, Franz submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the Permits requires Franz fully implement the revised SWPPP according to condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30 of the following year.

Franz is in violation of the Level Three Corrective Action requirements of the Permits. Franz's continuing violations of these requirements include, but are not limited to, its failure to submit to Ecology an Engineering Report, plans and specifications, and the operations and maintenance manual for the Level Three Corrective Actions for copper triggered in third quarter of 2020 and for zinc triggered in the fourth quarter of 2020, as indicated by Table 1. Indeed, Franz is in violation of the Permits for each instance in which quarterly stormwater sampling results from the facility were greater than a benchmark or outside the benchmark range for any three quarters during a calendar year and Franz failed to conduct and complete a Level Three Corrective Action for discharges from its facility in accordance with Permits' conditions by, inter alia, performing the required review, revision and certification of the SWPPP; complying with the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment; completing the required implementation of additional BMPs, including additional treatment BMPs; completing the required submission of an engineering report, plans, specifications, and an operations and maintenance plan; and including the required summarization in the annual report.

## **VI. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS**

### **A. Failure to Record Information**

Condition S4.B of the Permits requires Franz record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Franz collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Franz could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Franz is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

### **B. Failure to Retain Records**

Condition S9.C of the 2015 Permit and S9.D of the 2020 Permit require Franz to retain for a minimum of five years a copy of the current Permit, a copy of Franz's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permit. Franz is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

## **VII. FAILURE TO REPORT PERMIT VIOLATIONS**

Condition S9.E of the 2015 Permit and Condition S9.F of the 2020 Permit require Franz to take certain actions in the event it is unable to comply with any of the terms and conditions of the Permits which may endanger human health or the environment or exceed any numeric effluent limitation in the permit. In such circumstances, Franz must immediately



take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and Franz must immediately notify the appropriate Ecology regional office of the failure to comply. Franz must then submit a detailed written report to Ecology, including specified details, within 5 days of the time Franz became aware of the circumstances unless Ecology requests an earlier submission.

Franz routinely violates these requirements, including each and every time it failed to comply with the corrective action requirements described in section V of this Notice of Intent to Sue, and each and every time Franz discharged stormwater with concentrations of pollutants in excess of the Permits benchmarks, as described in Table 1 above. All these violations may endanger human health or the environment.

### **VIII. REQUEST FOR SWPPP**

Pursuant to Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, Waste Action Project hereby requests that Franz provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Franz fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

### **IX. CONCLUSION**

The above-described violations reflect those indicated by the information currently available to Waste Action Project. These violations are ongoing. Waste Action Project intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Sections 309(g)(2)(A) and 404(s)(4) of the CWA, 33 U.S.C. §§ 1319(d) and 1344(s)(4), each of the above-described violations subjects the violator to a penalty of up to \$56,461 per day for each violation. In addition to civil penalties, Waste Action Project will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Waste Action Project believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Franz under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Sincerely,

**SMITH & LOWNEY, PLLC**

By: s/ Richard A. Smith  
Richard A. Smith  
Savannah Rose

cc: Michael Regan, Administrator, U.S. EPA  
Michelle Pirzadeh, Acting Region 10 Administrator, U.S. EPA  
Laura Watson, Director, Washington Department of Ecology  
United States Bakery (501 SE Columbia Shores Blvd. Ste. 900, Vancouver, WA  
98661-8024)



## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
1/1/16	0	1/29/16	0.05	2/27/16	0.24	3/26/16	0
1/2/16	0	1/30/16	0.11	2/28/16	0.07	3/27/16	0.16
1/3/16	0	1/31/16	0	2/29/16	1.07	3/28/16	0.32
1/4/16	0.02	2/1/16	0.28	3/1/16	0.28	3/29/16	0
1/5/16	0.03	2/2/16	0.02	3/2/16	0.68	3/30/16	0
1/6/16	0.1	2/3/16	0.02	3/3/16	0.19	3/31/16	0
1/7/16	0	2/4/16	0.55	3/4/16	0.02	4/1/16	0
1/8/16	0	2/5/16	0.01	3/5/16	0.41	4/2/16	0
1/9/16	0	2/6/16	0.2	3/6/16	0.06	4/3/16	0
1/10/16	0	2/7/16	0	3/7/16	0.81	4/4/16	0.46
1/11/16	0	2/8/16	0	3/8/16	0.09	4/5/16	0
1/12/16	0.15	2/9/16	0	3/9/16	0.14	4/6/16	0
1/13/16	0.35	2/10/16	0	3/10/16	0.95	4/7/16	0
1/14/16	0.55	2/11/16	0.18	3/11/16	0.38	4/8/16	0
1/15/16	0.01	2/12/16	1.18	3/12/16	0.6	4/9/16	0
1/16/16	0.39	2/13/16	0.73	3/13/16	0.17	4/10/16	0
1/17/16	0.17	2/14/16	0.35	3/14/16	0.3	4/11/16	0
1/18/16	0.2	2/15/16	0.12	3/15/16	0.07	4/12/16	0
1/19/16	0.04	2/16/16	0.43	3/16/16	0	4/13/16	0.69
1/20/16	0.44	2/17/16	0	3/17/16	0	4/14/16	0.2
1/21/16	0.66	2/19/16	0.27	3/18/16	0	4/15/16	0.02
1/22/16	0.92	2/20/16	0.43	3/19/16	0	4/16/16	0
1/23/16	0.17	2/21/16	0	3/20/16	0	4/17/16	0
1/24/16	0.47	2/22/16	0.11	3/21/16	0.13	4/18/16	0
1/25/16	0	2/23/16	0	3/22/16	0.24	4/19/16	0
1/26/16	0.04	2/24/16	0	3/23/16	0.02	4/20/16	0
1/27/16	0.34	2/25/16	0.01	3/24/16	0.15	4/21/16	0
1/28/16	1.57	2/26/16	0	3/25/16	0	4/23/16	0.03

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
4/24/16	0.01	5/22/16	0.17	6/19/16	0.01	7/17/16	0
4/25/16	0.27	5/23/16	0	6/20/16	0	7/18/16	0.01
4/26/16	0.02	5/24/16	0	6/21/16	1.13	7/19/16	0
4/27/16	0	5/25/16	0	6/22/16	0	7/20/16	0
4/28/16	0	5/26/16	0	6/23/16	0.07	7/21/16	0
4/29/16	0	5/27/16	0	6/24/16	0.39	7/22/16	0.25
4/30/16	0.01	5/28/16	0.11	6/25/16	0.03	7/23/16	0.03
5/1/16	0	5/29/16	0.03	6/26/16	0	7/24/16	0
5/2/16	0	5/30/16	0.03	6/27/16	0	7/25/16	0
5/3/16	0	5/31/16	0	6/28/16	0	7/26/16	0
5/4/16	0	6/1/16	0	6/29/16	0	7/27/16	0
5/5/16	0	6/2/16	0.04	6/30/16	0	7/28/16	0
5/6/16	0	6/3/16	0	7/1/16	0	7/29/16	0
5/7/16	0	6/4/16	0	7/2/16	0	7/30/16	0
5/8/16	0.05	6/5/16	0	7/3/16	0	7/31/16	0
5/9/16	0.02	6/6/16	0	7/4/16	0	8/1/16	0
5/10/16	0	6/7/16	0	7/5/16	0.02	8/7/16	
5/11/16	0	6/8/16	0	7/6/16	0	8/8/16	0.06
5/12/16	0	6/9/16	0	7/7/16	0	8/9/16	0
5/13/16	0	6/10/16	0.04	7/8/16	0.16	8/10/16	0
5/14/16	0	6/11/16	0.02	7/9/16	0.11	8/11/16	0
5/15/16	0	6/12/16	0.09	7/10/16	0.01	8/12/16	0
5/16/16	0.08	6/13/16	0	7/11/16	0	8/13/16	0
5/17/16	0	6/14/16	0.01	7/12/16	0	8/14/16	0
5/18/16	0	6/15/16	0.03	7/13/16	0	8/15/16	0
5/19/16	0.35	6/16/16	0	7/14/16	0	8/16/16	0
5/20/16	0.4	6/17/16	0	7/15/16	0	8/17/16	0
5/21/16	0.04	6/18/16	0.38	7/16/16	0	8/18/16	0

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/19/16	0	9/17/16	0.12	10/15/16	1.41	11/12/16	0.1
8/20/16	0	9/18/16	0.24	10/16/16	0.69	11/13/16	0.06
8/21/16	0	9/19/16	0.01	10/17/16	0.33	11/14/16	0.39
8/22/16	0	9/20/16	0.01	10/18/16	0.19	11/15/16	0.98
8/24/16	0	9/21/16	0	10/19/16	0.01	11/16/16	0.33
8/25/16	0	9/22/16	0	10/20/16	1.18	11/17/16	0.01
8/26/16	0	9/23/16	0	10/21/16	0.49	11/18/16	0
8/27/16	0	9/24/16	0	10/22/16	0.01	11/19/16	0.06
8/28/16	0	9/25/16	0	10/23/16	0.17	11/20/16	0.09
8/29/16	0	9/26/16	0	10/24/16	0.01	11/21/16	0.08
8/30/16	0	9/27/16	0	10/25/16	0.15	11/22/16	0.01
8/31/16	0	9/28/16	0	10/26/16	0.28	11/23/16	0.62
9/1/16	0.01	9/29/16	0	10/27/16	1.54	11/24/16	0.5
9/2/16	0.07	9/30/16	0	10/28/16	0.07	11/27/16	
9/3/16	0.21	10/1/16	0.05	10/29/16	0.08	11/28/16	0.47
9/4/16	0.19	10/2/16	0.06	10/30/16	0.09	11/29/16	0.01
9/5/16	0	10/3/16	0	10/31/16	0.36	11/30/16	0.2
9/6/16	0.2	10/4/16	0.08	11/1/16	1.1	12/1/16	0.05
9/7/16	0.01	10/5/16	0.06	11/2/16	0.14	12/2/16	0.06
9/8/16	0.07	10/6/16	0.01	11/3/16	0.44	12/3/16	0.23
9/9/16	0	10/7/16	0.46	11/4/16	0	12/4/16	0.23
9/10/16	0	10/8/16	0.12	11/5/16	0.2	12/5/16	0.08
9/11/16	0	10/9/16	0.89	11/6/16	1.43	12/6/16	0.22
9/12/16	0	10/10/16	0.17	11/7/16	0.05	12/7/16	0
9/13/16	0	10/11/16	0	11/8/16	0.01	12/8/16	0
9/14/16	0	10/12/16	0	11/9/16	0.05	12/10/16	0.23
9/15/16	0	10/13/16	0.52	11/10/16	0.17	12/12/16	
9/16/16	0	10/14/16	2.07	11/11/16	0	12/13/16	0.03

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
12/14/16	0	1/12/17	0	2/9/17	2.02	3/9/17	0.15
12/15/16	0	1/13/17	0	2/10/17	0.82	3/10/17	0.52
12/16/16	0	1/14/17	0	2/11/17	0.03	3/11/17	0.02
12/17/16	0	1/15/17	0	2/12/17	0.02	3/12/17	0.33
12/18/16	0	1/16/17	0	2/13/17	0	3/13/17	0.14
12/19/16	0.46	1/17/17	0.05	2/14/17	0	3/14/17	0.76
12/20/16	0.3	1/18/17	2.39	2/15/17	1.09	3/15/17	0.54
12/21/16	0	1/19/17	0.59	2/16/17	1.75	3/16/17	0.34
12/22/16	0	1/20/17	0.16	2/17/17	0.03	3/17/17	0
12/23/16	0.72	1/21/17	0.01	2/18/17	0.02	3/18/17	0.98
12/24/16	0.32	1/22/17	0.04	2/19/17	0.18	3/19/17	0.66
12/25/16	0.01	1/23/17	0.11	2/20/17	0.11	3/20/17	0
12/26/16	0	1/24/17	0	2/21/17	0.25	3/21/17	0.15
12/27/16	0.55	1/25/17	0	2/22/17	0.29	3/22/17	0.05
12/28/16	0.01	1/26/17	0.02	2/23/17	0.01	3/23/17	0.03
12/29/16	0	1/27/17	0	2/24/17	0.08	3/24/17	0.33
12/30/16	0.25	1/28/17	0	2/25/17	0.01	3/25/17	0.43
12/31/16	0.01	1/29/17	0	2/26/17	0.23	3/26/17	0.01
1/1/17	0.2	1/30/17	0	2/27/17	0.37	3/27/17	0.35
1/2/17	0	1/31/17	0.01	2/28/17	0.2	3/28/17	0.09
1/3/17	0	2/1/17	0	3/1/17	0	3/29/17	0.35
1/5/17		2/2/17	0	3/2/17	0.02	3/30/17	0.13
1/6/17	0	2/3/17	0.12	3/3/17	0.1	3/31/17	0.02
1/7/17	0	2/4/17	0.85	3/4/17	0.82	4/1/17	0.03
1/8/17	0	2/5/17	0.71	3/5/17	0.14	4/2/17	0.08
1/9/17	0.61	2/6/17	1.23	3/6/17	0.01	4/3/17	0.02
1/10/17	0.19	2/7/17	0.17	3/7/17	0.09	4/4/17	0
1/11/17	0.03	2/8/17	0.02	3/8/17	0.44	4/5/17	0.34

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
4/6/17	0.6	5/4/17	0.02	6/3/17	0	7/2/17	0
4/7/17	0.24	5/5/17	0.7	6/4/17	0	7/3/17	0
4/8/17	0.18	5/6/17	0.48	6/5/17	0	7/4/17	0
4/9/17	0.06	5/7/17	0.01	6/6/17	0	7/5/17	0
4/10/17	0.37	5/8/17	0	6/7/17	0	7/6/17	0
4/11/17	0.09	5/9/17	0	6/8/17	0.24	7/7/17	0
4/12/17	0.63	5/10/17	0	6/9/17	0.1	7/8/17	0
4/13/17	0.39	5/11/17	0.12	6/10/17	0.02	7/9/17	0
4/14/17	0.08	5/12/17	0.3	6/11/17	0	7/10/17	0
4/15/17	0.01	5/13/17	0.16	6/12/17	0	7/11/17	0
4/16/17	0	5/14/17	0.02	6/13/17	0	7/13/17	0
4/17/17	0	5/15/17	0	6/14/17	0	7/14/17	0
4/18/17	0.19	5/16/17	0.47	6/15/17	0.03	7/15/17	0
4/19/17	0.09	5/17/17	0.05	6/16/17	1.4	7/16/17	0
4/20/17	0.41	5/18/17	0.01	6/17/17	0.01	7/17/17	0
4/21/17	0	5/19/17	0	6/18/17	0.02	7/18/17	0
4/22/17	0	5/20/17	0	6/19/17	0	7/19/17	0
4/23/17	0.12	5/21/17	0	6/20/17	0	7/20/17	0
4/24/17	0.34	5/22/17	0	6/21/17	0	7/21/17	0
4/25/17	0.01	5/23/17	0	6/22/17	0	7/22/17	0
4/26/17	0.04	5/24/17	0	6/24/17	0	7/26/17	
4/27/17	0.06	5/25/17	0	6/25/17	0	7/27/17	0
4/28/17	0.05	5/27/17	0	6/26/17	0	7/28/17	0
4/29/17	0	5/29/17	0	6/27/17	0	7/29/17	0
4/30/17	0.09	5/30/17	0	6/28/17	0	7/30/17	0
5/1/17	0.07	5/31/17	0	6/29/17	0	7/31/17	0
5/2/17	0.07	6/1/17	0.05	6/30/17	0	8/5/17	
5/3/17	0.34	6/2/17	0	7/1/17	0	8/6/17	0

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/7/17	0	9/7/17	0	10/6/17	0	11/4/17	0.21
8/8/17	0	9/8/17	0	10/8/17	0.07	11/5/17	0.86
8/11/17		9/9/17	0	10/9/17	0	11/6/17	0.2
8/12/17	0	9/10/17	0	10/10/17	0	11/7/17	0
8/13/17	0.02	9/11/17	0	10/11/17	0.02	11/8/17	0
8/14/17	0	9/12/17	0	10/12/17	0	11/9/17	0.19
8/15/17	0	9/13/17	0	10/13/17	0.19	11/10/17	0.25
8/16/17	0	9/14/17	0	10/14/17	0	11/11/17	0.02
8/17/17	0	9/15/17	0	10/15/17	0	11/12/17	0.54
8/18/17	0	9/17/17		10/16/17	0	11/13/17	0.35
8/19/17	0	9/18/17	0.08	10/17/17	0.02	11/14/17	0.64
8/20/17	0	9/19/17	0.51	10/18/17	0.03	11/15/17	0.58
8/21/17	0	9/20/17	0.51	10/19/17	1.4	11/16/17	0.08
8/22/17	0	9/21/17	0.02	10/20/17	0.49	11/17/17	0.06
8/23/17	0	9/22/17	0	10/21/17	0.34	11/18/17	0.01
8/24/17	0	9/23/17	0	10/22/17	0.87	11/19/17	0
8/25/17	0	9/24/17	0	10/23/17	0.01	11/20/17	0.93
8/26/17	0	9/25/17	0.02	10/24/17	0	11/21/17	0.29
8/28/17	0	9/26/17	0	10/25/17	0	11/22/17	1.2
8/29/17	0	9/27/17	0	10/26/17	0.01	11/23/17	0.54
8/30/17	0	9/28/17	0	10/27/17	0	11/26/17	
8/31/17	0.03	9/29/17	0	10/28/17	0	11/27/17	0.11
9/1/17	0.02	9/30/17	0.04	10/29/17	0	11/28/17	0.08
9/2/17	0	10/1/17	0.02	10/30/17	0	11/29/17	0.53
9/3/17	0	10/2/17	0	10/31/17	0	11/30/17	0.14
9/4/17	0	10/3/17	0	11/1/17	0	12/1/17	0.14
9/5/17	0	10/4/17	0	11/2/17	0	12/2/17	0.23
9/6/17	0	10/5/17	0	11/3/17	0.6	12/3/17	0.66

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
12/4/17	0.01	1/1/18	0	1/29/18	0.04	2/26/18	0
12/5/17	0	1/2/18	0	1/30/18	0.93	2/27/18	0
12/6/17	0	1/3/18	0	1/31/18	0	2/28/18	0.48
12/7/17	0	1/4/18	0	2/1/18	0.02	3/1/18	0.46
12/8/17	0	1/5/18	0.3	2/2/18	0.62	3/2/18	0.15
12/9/17	0	1/6/18	0.44	2/3/18	0.03	3/3/18	0
12/10/17	0	1/7/18	0.16	2/4/18	0.15	3/4/18	0
12/11/17	0	1/8/18	0.38	2/5/18	0.02	3/5/18	0.07
12/12/17	0	1/9/18	0.26	2/6/18	0	3/6/18	0
12/13/17	0	1/10/18	0.19	2/7/18	0	3/7/18	0
12/14/17	0	1/11/18	0.35	2/8/18	0	3/8/18	0.09
12/15/17	0.01	1/12/18	0.78	2/9/18	0.11	3/9/18	0.46
12/16/17	0.02	1/13/18	0.1	2/10/18	0.03	3/10/18	0
12/17/17	0.09	1/14/18	0.01	2/11/18	0	3/12/18	0
12/18/17	0.14	1/15/18	0	2/12/18	0	3/13/18	0
12/19/17	1.43	1/16/18	0.26	2/13/18	0	3/14/18	0.21
12/20/17	0.49	1/17/18	0.04	2/14/18	0.21	3/15/18	0
12/21/17	0	1/18/18	0.87	2/15/18	0.05	3/16/18	0
12/22/17	0.13	1/19/18	0.24	2/16/18	0.08	3/17/18	0
12/23/17	0.03	1/20/18	0.07	2/17/18	0.2	3/18/18	0
12/24/17	0	1/21/18	0.06	2/18/18	0.11	3/19/18	0
12/25/17	0.26	1/22/18	0.32	2/19/18	0.03	3/20/18	0
12/26/17	0.01	1/23/18	0.02	2/20/18	0	3/21/18	0
12/27/17	0	1/24/18	0.97	2/21/18	0.02	3/22/18	0.24
12/28/17	0	1/25/18	0.33	2/22/18	0.08	3/23/18	0.31
12/29/17	0.78	1/26/18	0.15	2/23/18	0	3/24/18	0.56
12/30/17	0.8	1/27/18	0.72	2/24/18	0.01	3/26/18	
12/31/17	0.09	1/28/18	0.13	2/25/18	0.11	3/27/18	0.07

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/28/18	0.03	4/25/18	0	5/23/18	0	6/20/18	0
3/29/18	0.01	4/26/18	0	5/24/18	0	6/21/18	0
3/30/18	0	4/27/18	0	5/25/18	0.01	6/22/18	0
3/31/18	0	4/28/18	0.26	5/26/18	0	6/23/18	0.18
4/1/18	0	4/29/18	0.15	5/27/18	0	6/24/18	0
4/2/18	0.16	4/30/18	0.01	5/28/18	0	6/25/18	0.13
4/3/18	0	5/1/18	0.01	5/29/18	0	6/26/18	0.02
4/4/18	0.09	5/2/18	0	5/30/18	0	6/27/18	0
4/5/18	0.22	5/3/18	0	5/31/18	0	6/29/18	0
4/6/18	0.22	5/4/18	0	6/1/18	0.02	6/30/18	0
4/7/18	0.47	5/5/18	0	6/2/18	0	7/1/18	0.02
4/8/18	0.6	5/6/18	0.03	6/3/18	0	7/2/18	0
4/9/18	0.08	5/7/18	0	6/4/18	0.04	7/3/18	0
4/10/18	0.05	5/8/18	0	6/5/18	0.05	7/4/18	0
4/11/18	0.22	5/9/18	0.04	6/6/18	0	7/5/18	0
4/12/18	0.22	5/10/18	0	6/7/18	0	7/6/18	0
4/13/18	0.19	5/11/18	0.04	6/8/18	0	7/7/18	0
4/14/18	0.61	5/12/18	0	6/9/18	0.26	7/8/18	0
4/15/18	1.78	5/13/18	0	6/10/18	0.16	7/9/18	0
4/16/18	0.13	5/14/18	0	6/11/18	0.09	7/10/18	0.01
4/17/18	0.28	5/15/18	0	6/12/18	0	7/11/18	0
4/18/18	0.01	5/16/18	0	6/13/18	0.13	7/12/18	0
4/19/18	0.02	5/17/18	0	6/14/18	0	7/13/18	0
4/20/18	0	5/18/18	0	6/15/18	0	7/15/18	0
4/21/18	0.08	5/19/18	0	6/16/18	0	7/16/18	0
4/22/18	0.02	5/20/18	0.02	6/17/18	0	7/17/18	0
4/23/18	0	5/21/18	0	6/18/18	0	7/18/18	0
4/24/18	0	5/22/18	0	6/19/18	0	7/19/18	0



## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
7/20/18	0	8/27/18	0.07	9/24/18	0	10/23/18	0
7/22/18	0	8/28/18	0	9/25/18	0	10/24/18	0.04
7/23/18	0	8/29/18	0	9/26/18	0	10/25/18	0
7/24/18	0	8/30/18	0	9/27/18	0	10/26/18	0.85
7/25/18	0	8/31/18	0	9/28/18	0	10/27/18	0.02
7/26/18	0	9/1/18	0	9/29/18	0	10/28/18	1.13
7/27/18	0	9/2/18	0	9/30/18	0.11	10/29/18	0.25
7/28/18	0	9/3/18	0	10/1/18	0.02	10/30/18	0.01
7/29/18	0	9/4/18	0	10/2/18	0.36	10/31/18	0.05
8/5/18		9/5/18	0	10/3/18	0.04	11/1/18	0.02
8/6/18	0	9/6/18	0	10/4/18	0	11/2/18	0.25
8/7/18	0	9/7/18	0	10/5/18	0	11/3/18	0
8/8/18	0	9/8/18	0.08	10/6/18	0.4	11/4/18	0.2
8/11/18		9/9/18	0	10/7/18	0	11/5/18	0.08
8/12/18	0.03	9/10/18	0.22	10/8/18	0.11	11/6/18	0.02
8/13/18	0	9/11/18	0	10/9/18	0.37	11/7/18	0.06
8/14/18	0	9/12/18	0.04	10/10/18	0.01	11/8/18	0
8/15/18	0	9/13/18	0	10/11/18	0	11/9/18	0
8/16/18	0	9/14/18	0.26	10/12/18	0	11/10/18	0.12
8/18/18	0	9/15/18	0.2	10/13/18	0	11/11/18	0
8/19/18	0	9/16/18	0.31	10/14/18	0	11/12/18	0
8/20/18	0	9/17/18	0.04	10/15/18	0	11/13/18	0
8/21/18	0	9/18/18	0	10/16/18	0	11/14/18	0.02
8/22/18	0	9/19/18	0	10/17/18	0	11/15/18	0.06
8/23/18	0	9/20/18	0.17	10/18/18	0	11/16/18	0.02
8/24/18	0	9/21/18	0	10/19/18	0	11/17/18	0
8/25/18	0	9/22/18	0.11	10/21/18	0	11/18/18	0
8/26/18	0.01	9/23/18	0.03	10/22/18	0	11/19/18	0

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
11/20/18	0	12/20/18	0.11	1/17/19	0.07	2/14/19	0
11/21/18	0	12/21/18	0.15	1/18/19	0.11	2/15/19	0.18
11/22/18	0.24	12/22/18	0.01	1/19/19	0.31	2/16/19	0.02
11/25/18		12/23/18	0.63	1/20/19	0.08	2/17/19	0.29
11/26/18	0.27	12/24/18	0.42	1/21/19	0	2/18/19	0.06
11/27/18	1.62	12/25/18	0.02	1/22/19	0	2/19/19	0.04
11/28/18	0.49	12/26/18	0	1/23/19	0.69	2/20/19	0.25
11/29/18	0.15	12/27/18	0.16	1/24/19	0.14	2/21/19	0.03
11/30/18	0.01	12/28/18	0.04	1/25/19	0.01	2/22/19	0
12/1/18	0.18	12/29/18	0.37	1/26/19	0	2/23/19	0.14
12/2/18	0.09	12/30/18	0.69	1/27/19	0	2/24/19	0.17
12/3/18	0.01	12/31/18	0.01	1/28/19	0	2/25/19	0.01
12/4/18	0	1/1/19	0	1/29/19	0	2/26/19	0
12/5/18	0	1/2/19	0	1/30/19	0	2/27/19	0
12/6/18	0	1/3/19	0.52	1/31/19	0	2/28/19	0
12/7/18	0	1/4/19	0.4	2/1/19	0.2	3/1/19	0
12/8/18	0.01	1/5/19	0.01	2/2/19	0.37	3/2/19	0
12/9/18	0	1/6/19	0.21	2/3/19	0.04	3/3/19	0
12/10/18	0.59	1/7/19	0.27	2/4/19	0.38	3/4/19	0
12/11/18	0.19	1/8/19	0.01	2/5/19	0.01	3/5/19	0
12/12/18	0.43	1/9/19	0.36	2/6/19	0	3/6/19	0
12/13/18	0.16	1/10/19	0.26	2/7/19	0	3/7/19	0.3
12/14/18	0.15	1/11/19	0.02	2/8/19	0	3/8/19	0.02
12/15/18	0.02	1/12/19	0	2/9/19	0.81	3/9/19	0.05
12/16/18	0.36	1/13/19	0	2/10/19	0.03	3/10/19	0
12/17/18	0.39	1/14/19	0	2/11/19	0.17	3/11/19	0
12/18/18	1.02	1/15/19	0	2/12/19	1.45	3/12/19	0.76
12/19/18	0.12	1/16/19	0	2/13/19	0.19	3/13/19	0.05

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/14/19	0	4/11/19	0.38	5/9/19	0	6/6/19	0
3/15/19	0	4/12/19	0.52	5/10/19	0	6/7/19	0
3/16/19	0	4/13/19	0.01	5/11/19	0	6/8/19	0.14
3/17/19	0	4/14/19	0.06	5/12/19	0	6/9/19	0
3/18/19	0	4/15/19	0.02	5/13/19	0	6/10/19	0
3/19/19	0	4/16/19	0.03	5/14/19	0.02	6/11/19	0
3/20/19	0	4/17/19	0.14	5/15/19	0.14	6/12/19	0
3/21/19	0	4/18/19	0.06	5/16/19	0.04	6/13/19	0
3/22/19	0	4/19/19	0.11	5/17/19	0.36	6/14/19	0
3/23/19	0.01	4/20/19	0.21	5/18/19	0.01	6/15/19	0
3/24/19	0	4/21/19	0	5/19/19	0	6/16/19	0
3/25/19	0	4/22/19	0.01	5/20/19	0	6/17/19	0
3/26/19	0.22	4/23/19	0.14	5/21/19	0.11	6/18/19	0.05
3/27/19	0	4/24/19	0	5/22/19	0	6/19/19	0.02
3/28/19	0	4/25/19	0	5/23/19	0	6/20/19	0.37
3/29/19	0	4/26/19	0	5/24/19	0	6/21/19	0
3/30/19	0	4/27/19	0	5/25/19	0	6/22/19	0
3/31/19	0	4/28/19	0	5/26/19	0.27	6/23/19	0.04
4/1/19	0	4/29/19	0	5/27/19	0	6/24/19	0.03
4/2/19	0	4/30/19	0	5/28/19	0	6/25/19	0.01
4/3/19	0.01	5/1/19	0	5/29/19	0	6/26/19	0
4/4/19	0.02	5/2/19	0	5/30/19	0	6/27/19	0.06
4/5/19	0.21	5/3/19	0	5/31/19	0	6/28/19	0.02
4/6/19	0.22	5/4/19	0	6/1/19	0	6/29/19	0
4/7/19	0.48	5/5/19	0	6/2/19	0	6/30/19	0
4/8/19	0.02	5/6/19	0	6/3/19	0	7/1/19	0
4/9/19	0.29	5/7/19	0	6/4/19	0	7/2/19	0
4/10/19	0.01	5/8/19	0	6/5/19	0	7/3/19	0.43

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
7/4/19	0.01	8/10/19	0.33	9/12/19	0	10/10/19	0
7/5/19	0	8/16/19		9/13/19	0.2	10/11/19	0
7/6/19	0	8/17/19	0	9/14/19	0	10/12/19	0
7/7/19	0	8/18/19	0	9/15/19	0.34	10/13/19	0
7/10/19		8/19/19	0	9/16/19	0.18	10/14/19	0
7/11/19	0.15	8/20/19	0	9/17/19	0.03	10/15/19	0
7/12/19	0	8/21/19	0.11	9/18/19	0.5	10/16/19	0.1
7/13/19	0	8/22/19	0.11	9/19/19	0.01	10/17/19	0.34
7/14/19	0	8/23/19	0	9/20/19	0.02	10/18/19	0.18
7/16/19		8/24/19	0	9/21/19	0	10/19/19	1.26
7/17/19	0.02	8/25/19	0	9/22/19	0.03	10/20/19	0.21
7/18/19	0.13	8/26/19	0	9/23/19	0.23	10/21/19	0.16
7/19/19	0.1	8/27/19	0	9/24/19	0.12	10/22/19	0.3
7/20/19	0	8/28/19	0	9/25/19	0.01	10/23/19	0.03
7/21/19	0	8/29/19	0	9/26/19	0.03	10/24/19	0
7/22/19	0	8/30/19	0.08	9/27/19	0.13	10/25/19	0
7/23/19	0	8/31/19	0	9/28/19	0.08	10/26/19	0.23
7/24/19	0	9/1/19	0.02	9/29/19	0.09	10/27/19	0
7/25/19	0	9/2/19	0	9/30/19	0.02	10/28/19	0
7/26/19	0	9/3/19	0	10/1/19	0	10/29/19	0
7/27/19	0	9/4/19	0	10/2/19	0	10/30/19	0
7/28/19	0	9/5/19	0	10/3/19	0.01	10/31/19	0
8/4/19		9/6/19	0	10/4/19	0.08	11/1/19	0
8/5/19	0	9/7/19	0	10/5/19	0.01	11/3/19	0
8/6/19	0	9/8/19	0.66	10/6/19	0	11/4/19	0
8/7/19	0	9/9/19	0.1	10/7/19	0	11/5/19	0
8/8/19	0	9/10/19	0.3	10/8/19	0.02	11/6/19	0
8/9/19	0	9/11/19	0.01	10/9/19	0.41	11/7/19	0

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
11/8/19	0	12/8/19	0.14	1/5/20	0.17	2/3/20	0.09
11/9/19	0.11	12/9/19	0.01	1/6/20	0.29	2/4/20	0.01
11/10/19	0.14	12/10/19	0	1/7/20	0.56	2/5/20	0.49
11/11/19	0.01	12/11/19	0.15	1/8/20	0.05	2/6/20	0.84
11/12/19	0.23	12/12/19	0.45	1/9/20	0.09	2/7/20	0.53
11/13/19	0.04	12/13/19	0.15	1/10/20	0.13	2/8/20	0.28
11/14/19	0	12/14/19	0.02	1/11/20	0.56	2/9/20	0.02
11/15/19	0.19	12/15/19	0.55	1/12/20	0.26	2/10/20	0
11/16/19	0.01	12/16/19	0.14	1/13/20	0.1	2/11/20	0
11/17/19	0.04	12/17/19	0.01	1/15/20	0.02	2/12/20	0.18
11/18/19	0.1	12/18/19	0	1/16/20	0.02	2/13/20	0.01
11/19/19	0.57	12/19/19	0.41	1/17/20	0	2/14/20	0.05
11/20/19	0.05	12/20/19	2.35	1/18/20	0.5	2/15/20	0.1
11/21/19	0	12/21/19	2.25	1/19/20	0.03	2/16/20	0.29
11/22/19	0	12/22/19	0.28	1/20/20	0.06	2/17/20	0.01
11/23/19	0	12/23/19	0.37	1/21/20	0.24	2/18/20	0
11/24/19	0.04	12/24/19	0.03	1/22/20	0.79	2/21/20	
11/25/19	0.1	12/25/19	0	1/23/20	0.43	2/22/20	0
11/26/19	0.13	12/26/19	0	1/24/20	0.8	2/23/20	0.19
11/27/19	0.02	12/27/19	0.03	1/25/20	0.5	2/24/20	0.01
11/28/19	0	12/28/19	0.01	1/26/20	0.3	2/25/20	0
12/1/19		12/29/19	0.01	1/27/20	0.09	2/26/20	0.02
12/2/19	0.05	12/30/19	0.05	1/28/20	1.02	2/27/20	0.01
12/3/19	0	12/31/19	0.04	1/29/20	0.06	2/28/20	0
12/4/19	0.02	1/1/20	0.19	1/30/20	0.24	2/29/20	0.16
12/5/19	0.02	1/2/20	0	1/31/20	0.27	3/1/20	0.09
12/6/19	0	1/3/20	0.17	2/1/20	1.44	3/2/20	0.01
12/7/19	0.27	1/4/20	0.27	2/2/20	0.01	3/3/20	0.06

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/4/20	0.03	4/1/20	0.05	4/29/20	0	5/27/20	0.02
3/5/20	0	4/2/20	0.04	4/30/20	0.03	5/28/20	0
3/6/20	0.6	4/3/20	0	5/1/20	0	5/29/20	0
3/7/20	0.1	4/4/20	0	5/2/20	0.09	5/30/20	0
3/8/20	0.03	4/5/20	0	5/3/20	0.21	5/31/20	1.19
3/9/20	0.01	4/6/20	0	5/4/20	0	6/1/20	0.02
3/10/20	0	4/7/20	0	5/5/20	0	6/2/20	0
3/11/20	0.03	4/8/20	0	5/6/20	0	6/3/20	0
3/12/20	0.02	4/9/20	0	5/7/20	0	6/4/20	0
3/13/20	0.09	4/10/20	0	5/8/20	0	6/5/20	0
3/14/20	0.29	4/11/20	0	5/9/20	0	6/6/20	0
3/15/20	0	4/12/20	0	5/10/20	0	6/7/20	0.04
3/16/20	0	4/13/20	0	5/11/20	0	6/8/20	0.02
3/17/20	0	4/14/20	0	5/12/20	0.04	6/9/20	0.11
3/18/20	0	4/15/20	0	5/13/20	0.05	6/10/20	0.2
3/19/20	0	4/16/20	0	5/14/20	0.08	6/11/20	0.02
3/20/20	0	4/17/20	0	5/15/20	0.07	6/12/20	0.14
3/21/20	0	4/18/20	0	5/16/20	0.02	6/13/20	0.26
3/22/20	0	4/19/20	0.04	5/17/20	0.65	6/14/20	0.01
3/23/20	0	4/20/20	0	5/18/20	0.02	6/15/20	0.07
3/24/20	0.06	4/21/20	0	5/19/20	0	6/16/20	0.12
3/25/20	0.13	4/22/20	0.02	5/20/20	0	6/17/20	0
3/26/20	0.05	4/23/20	0.76	5/21/20	0.22	6/18/20	0
3/27/20	0.03	4/24/20	0.11	5/22/20	0.21	6/19/20	0
3/28/20	0.03	4/25/20	0.17	5/23/20	0.17	6/20/20	0.01
3/29/20	0.68	4/26/20	0.25	5/24/20	0	6/21/20	0.03
3/30/20	0.4	4/27/20	0.22	5/25/20	0.04	6/22/20	0
3/31/20	0.24	4/28/20	0.04	5/26/20	0.08	6/23/20	0

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
6/25/20	0	7/23/20	0	8/20/20	0.01	9/17/20	0
6/26/20	0	7/24/20	0	8/21/20	0.07	9/18/20	0
6/27/20	0	7/25/20	0	8/22/20	0.05	9/19/20	0.27
6/28/20	0.61	7/26/20	0	8/23/20	0	9/20/20	0.05
6/29/20	0.01	7/27/20	0	8/24/20	0	9/21/20	0
6/30/20	0.03	7/28/20	0	8/25/20	0	9/22/20	0.03
7/1/20	0.01	7/29/20	0	8/26/20	0	9/23/20	0.16
7/2/20	0	7/30/20	0	8/27/20	0	9/24/20	0.93
7/3/20	0	7/31/20	0	8/28/20	0	9/25/20	0.7
7/4/20	0	8/1/20	0	8/29/20	0	9/26/20	0.32
7/5/20	0	8/2/20	0	8/30/20	0	9/27/20	0.04
7/6/20	0	8/3/20	0	8/31/20	0.02	9/28/20	0
7/7/20	0	8/4/20	0	9/1/20	0	9/29/20	0
7/8/20	0.02	8/5/20	0	9/2/20	0	9/30/20	0
7/9/20	0.01	8/6/20	0.05	9/3/20	0	10/1/20	0
7/10/20	0.02	8/7/20	0.04	9/4/20	0	10/2/20	0
7/11/20	0	8/8/20	0.01	9/5/20	0	10/3/20	0
7/12/20	0.01	8/9/20	0.02	9/6/20	0	10/4/20	0.02
7/13/20	0.04	8/10/20	0	9/7/20	0	10/5/20	0.02
7/14/20	0	8/11/20	0	9/8/20	0	10/6/20	0
7/15/20	0	8/12/20	0	9/9/20	0	10/7/20	0
7/16/20	0	8/13/20	0	9/10/20	0	10/8/20	0
7/17/20	0.13	8/14/20	0	9/11/20	0	10/9/20	0
7/18/20	0.03	8/15/20	0	9/12/20	0	10/10/20	0.95
7/19/20	0	8/16/20	0	9/13/20	0	10/11/20	0.01
7/20/20	0	8/17/20	0	9/14/20	0	10/12/20	0.44
7/21/20	0	8/18/20	0	9/15/20	0.06	10/13/20	0.63
7/22/20	0.01	8/19/20	0	9/16/20	0.02	10/14/20	0.02

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
10/15/20	0	11/12/20	0.01	12/10/20	0.03	1/7/21	0
10/16/20	0	11/13/20	1.07	12/11/20	0.03	1/8/21	0.09
10/17/20	0.18	11/14/20	0.01	12/12/20	0	1/9/21	0.17
10/18/20	0.01	11/15/20	0.58	12/13/20	0.08	1/10/21	0.11
10/19/20	0.06	11/16/20	0.11	12/14/20	0.22	1/11/21	0.02
10/20/20	0.08	11/17/20	0.57	12/15/20	0.26	1/12/21	1.74
10/21/20	0.07	11/18/20	0.4	12/16/20	0.13	1/13/21	1.18
10/22/20	0.18	11/19/20	0.56	12/17/20	0.55	1/14/21	0.01
10/23/20	0.02	11/20/20	0.08	12/18/20	0.07	1/15/21	0.18
10/24/20	0.17	11/21/20	0.04	12/19/20	0.12	1/16/21	0.01
10/25/20	0	11/22/20	0.01	12/20/20	0.4	1/17/21	0.05
10/26/20	0	11/23/20	0.21	12/21/20	0.4	1/18/21	0
10/27/20	0	11/24/20	0.02	12/22/20	1.75	1/19/21	0
10/28/20	0	11/25/20	0.13	12/23/20	0.01	1/20/21	0
10/29/20	0.02	11/26/20	0.09	12/24/20	0	1/21/21	0.04
10/30/20	0.03	11/27/20	0.03	12/25/20	0	1/22/21	0.02
10/31/20	0	11/28/20	0.04	12/26/20	0.46	1/23/21	0
11/1/20	0	11/29/20	0.03	12/27/20	0.07	1/24/21	0.05
11/2/20	0	11/30/20	0.47	12/28/20	0.13	1/25/21	0.15
11/3/20	0.08	12/1/20	0.01	12/29/20	0	1/26/21	0.01
11/4/20	0.9	12/2/20	0	12/30/20	0.59	1/27/21	0.08
11/5/20	0.15	12/3/20	0	12/31/20	0.61	1/28/21	0.24
11/6/20	0.11	12/4/20	0	1/1/21	0.12	1/29/21	0.14
11/7/20	0	12/5/20	0	1/2/21	0.4	1/30/21	0.12
11/8/20	0.01	12/6/20	0.02	1/3/21	2	1/31/21	0.2
11/9/20	0	12/7/20	0	1/4/21	0.61	2/1/21	0.4
11/10/20	0.12	12/8/20	0.06	1/5/21	0.18	2/2/21	0.83
11/11/20	0.03	12/9/20	0.6	1/6/21	1.19	2/3/21	0.61



## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
2/4/21	0.01	3/4/21	0	4/2/21	0	5/2/21	0.04
2/5/21	0.04	3/5/21	0.42	4/3/21	0	5/3/21	0
2/6/21	0.01	3/6/21	0.04	4/4/21	0.08	5/4/21	0.19
2/7/21	0	3/7/21	0.11	4/5/21	0.01	5/5/21	0
2/8/21	0.22	3/9/21	0.01	4/6/21	0	5/6/21	0
2/9/21	0.01	3/10/21	0.01	4/7/21	0	5/7/21	0.02
2/10/21	0	3/11/21	0	4/8/21	0.19	5/8/21	0.03
2/11/21	0	3/12/21	0	4/9/21	0	5/9/21	0.01
2/12/21	0.02	3/13/21	0	4/10/21	0.05	5/10/21	0
2/13/21	0.65	3/14/21	0	4/11/21	0	5/11/21	0
2/14/21	0.24	3/15/21	0.38	4/12/21	0	5/12/21	0
2/15/21	0.37	3/16/21	0.01	4/13/21	0	5/13/21	0
2/16/21	0.17	3/17/21	0	4/14/21	0	5/14/21	0
2/17/21	0.02	3/18/21	0	4/15/21	0	5/15/21	0
2/18/21	0.11	3/19/21	0.22	4/16/21	0	5/16/21	0
2/19/21	0.12	3/20/21	0.24	4/18/21	0	5/17/21	0
2/20/21	0.07	3/21/21	0.13	4/19/21	0	5/18/21	0.07
2/21/21	0.02	3/22/21	0.15	4/20/21	0	5/19/21	0.36
2/22/21	0.25	3/23/21	0.25	4/21/21	0	5/20/21	0.01
2/23/21	0.12	3/24/21	0.02	4/22/21	0	5/21/21	0
2/24/21	0.28	3/25/21	0.72	4/23/21	0	5/22/21	0
2/25/21	0.22	3/26/21	0.02	4/25/21		5/23/21	0
2/26/21	0.02	3/27/21	0	4/26/21	0.01	5/24/21	0.03
2/27/21	0.12	3/28/21	0	4/27/21	0	5/25/21	0.05
2/28/21	0.03	3/29/21	0.51	4/28/21	0	5/26/21	0
3/1/21	0	3/30/21	0.01	4/29/21	0	5/27/21	0.21
3/2/21	0	3/31/21	0	4/30/21	0.07	5/28/21	0.16
3/3/21	0.02	4/1/21	0	5/1/21	0.04	5/29/21	0

## Precipitation Data for Seattle, WA - Station ID US1WAKG0200

Date	Inches	Date	Inches	Date	Inches	Date	Inches
5/30/21	0	6/28/21	0	7/26/21	0	8/28/21	0
5/31/21	0	6/29/21	0	7/27/21	0	8/29/21	0
6/1/21	0	6/30/21	0	7/28/21	0	8/30/21	0
6/2/21	0	7/1/21	0	7/29/21	0	8/31/21	0
6/3/21	0	7/2/21	0	7/30/21	0	9/1/21	0
6/4/21	0	7/3/21	0	7/31/21	0	9/2/21	0
6/5/21	0	7/4/21	0	8/1/21	0	9/3/21	0
6/6/21	0	7/5/21	0	8/2/21	0	9/4/21	0
6/7/21	0.8	7/6/21	0	8/3/21	0	9/5/21	0
6/8/21	0	7/7/21	0	8/4/21	0.03	9/6/21	0
6/9/21	0.01	7/8/21	0	8/5/21	0	9/7/21	0
6/10/21	0	7/9/21	0	8/6/21	0.03	9/8/21	0
6/11/21	0	7/10/21	0	8/7/21	0.02	9/9/21	0
6/12/21	0.5	7/11/21	0	8/8/21	0.28	9/10/21	0
6/13/21	0.36	7/12/21	0	8/9/21	0	9/11/21	0
6/14/21	0.64	7/13/21	0	8/10/21	0	9/12/21	0.02
6/15/21	0.07	7/14/21	0	8/11/21	0	9/13/21	0.03
6/16/21	0	7/15/21	0	8/12/21	0	9/14/21	0
6/17/21	0	7/16/21	0	8/13/21	0	9/15/21	0.04
6/18/21	0	7/17/21	0	8/14/21	0	9/16/21	0
6/19/21	0	7/18/21	0	8/15/21	0	9/17/21	0.02
6/20/21	0	7/19/21	0	8/16/21	0		
6/22/21	0	7/20/21	0	8/21/21			
6/23/21	0	7/21/21	0	8/22/21	0		
6/24/21	0	7/22/21	0	8/23/21	0		
6/25/21	0	7/23/21	0	8/24/21	0		
6/26/21	0	7/24/21	0	8/25/21	0		
6/27/21	0	7/25/21	0	8/27/21	0.04		